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Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

OREGON NATURAL DESERT ASS'N,

Plaintiff,

v.

**BRENDAN CAIN, Burns District Manager,
Bureau of Land Management, *et al.*,**

Defendants,

and

HARNEY COUNTY,

Defendant-Intervenor.

Case No. 3:09-cv-00369-PK

**DECLARATION OF JOHN
ATKINSON**

I, John Atkinson, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

1. I am a Senior Enterprise Services Specialist with Ricoh USA, which owns IKON Document Services. I have been with the company since October 2000 , working with a primary focus of providing litigation and eDiscovery services to law firms, corporate legal departments and government agencies. Our service offerings support all phases of litigation including the production of Administrative Records. Given my professional experience, I am familiar with invoicing and with the work and costs typically needed to finalize an agency Administrative Record in federal-court litigation.
2. I have reviewed IKON's invoice to BLM, dated September 3, 2009 (attached to this declaration), and am familiar with the nature of the costs billed to the government. I understand that these costs were incurred with relation to the above-captioned case and that the invoice billed a total of \$3,036.83 to BLM.
3. In its September 3, 2009 invoice, IKON billed BLM for adding a unique page number (an "E-Label," or as commonly known, an electronic "Bates" number) to each of 13,479 pages, and for making 13,479 pages

word-searchable by “OCR”ing each page (OCR stands for Optical Character Recognition). The invoice also indicates that BLM incurred costs for IKON’s copying 151 pages of 11x17 color paper documents and 770 pages of 8.5x11 color paper documents into electronic images.

Further, the invoice shows that BLM incurred costs for “image conversion” of electronic documents – which typically initially exist in various formats -- to a non-editable format, for printing a final set of the documents, and for making a total of six discs.

4. In 2009 these processes required specialized software and equipment.

It is commonplace in the legal community for this work to be contracted to specialized vendors based on the technical needs and deadline associated with finalizing these records.

Dated this 26th day of February, 2018.


/s/ John Atkinson
JOHN ATKINSON

SEP-08-2009 TUE 06:04 AM DOJ BUR LAND MGMT

FAX NO. 5038086333

P. 02



**Document Efficiency
At Work.**
A KODAK COMPANY

IKON Office Solutions - Portland, OR
Phone: (503) 225-9066 Fax: (503) 225-1930
Federal ID: 230334400

INVOICE

Page 1 of 1

Invoice #	POR09090025
Invoice Date:	09/03/2009
Due Date:	09/13/2009
Terms	Net 10 Days
Customer Code:	POR-0018
Natl ID:	66816

BILL TO:
BLM
4735 E.MARGINAL WAY,S.
SEATTLE, WA 98134

Price Using: STANDARD Price

Reference / Case #	Reference 2	Reference 3	Account Manager
69014			SUSAN BAILEY

Shipped TO: BLM 333 SW 1ST AVE, PORTLAND, OR, 97204

Sales Order	Order Date	Ordered By	Quantity	Unit Price	Extension
SO-0909-1011	09/02/2009	CELLINA BURKE			
DVD - Master			1.00	30.0000	30.00
DVD - Duplication(s)			6.00	15.0000	90.00
Technical Services (hr)			1.00	150.0000	150.00
Color 11x17 Copies			151.00	1.0000	151.00
Color 8.5x11 (Letter) Copies			770.00	0.5000	385.00
E-Labels Endorsement			13,479.00	0.0300	404.37
Image Conversion (Basic PDF/TIFF per GB)			0.00	600.0000	534.00
OCR			13,479.00	0.0400	539.16
Prints w/o Assembly			12,555.00	0.0600	753.30
Sales Order Total:					3,036.83
Shipment Totals:	Taxable Sales:	0.00			
	Sales Tax:	0.00	Postage:	0.00	
	Non-Taxable:	3,036.83	Delivery:	0.00	Total Shipment:
					3,036.83

Please Pay From This Invoice		Taxable Sales:	0.00
Customer's duly authorized signature below is an agreement that the above-described work has been received and accepted by Customer. Customer assumes payment of this invoice within 10 days. Interest at the rate of the lesser of 1.5% per month or the maximum legal rate will be charged on invoices not paid within 10 days. Customer agrees to pay legal fees incurred in the collection of past due accounts.		Sales Tax:	0.00
		Non-Taxable:	3,036.83
		Postage:	0.00
		Delivery:	0.00
		PAY THIS AMOUNT \$	3,036.83

THE PERSON SIGNING THIS INVOICE ON BEHALF OF CUSTOMER REPRESENTS THAT HE/SHE HAS THE AUTHORITY TO DO SO

Received and Accepted by: Stacy Link Date: 9-8-09

Please pay from this copy. The party named on this bill is held responsible for payment.

Payment From:
BLM
4735 E.MARGINAL WAY,S.
SEATTLE, WA 98134

Amount Enclosed

\$

Please Remit To:
IKON Office Solutions
LDS Western District - POR
P O Box 31001-0743
Pasadena, CA 91110-0743

Invoice: POR09090025

Invoice Date: 09/03/2009
Due Date: 09/13/2009
Customer Code: POR-0018
Natl ID: 66816

**PAY THIS
AMOUNT \$ 3,036.83**

2/2

To: 5038086333

SEP-08-2009 16:45 From:

SEP-08-2009 07:01AM From: 5038086333

ID:

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